

# **EXHIBIT A**

1                           MICHAEL HALL  
2                           IN THE UNITED STATES BANKRUPTCY COURT  
3                           FOR THE EASTERN DISTRICT OF MICHIGAN  
4  
5  
6     In re                                                           ) Chapter 9  
7     CITY OF DETROIT, MICHIGAN,                               ) Case No. 13-53846  
8                                                                           Debtor. ) Hon. Steven W. Rhodes  
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10                                                                           

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13                           The Videotaped Deposition of MICHAEL HALL,  
14                           Taken at 1114 Washington Boulevard,  
15                           Detroit, Michigan,  
16                           Commencing at 8:57 a.m.,  
17                           Wednesday, July 2, 2014,  
18                           Before Kathryn L. Janes, CSR-3442, RMR, RPR.  
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21  
22  
23  
24  
25

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1                           MICHAEL HALL

2                           what your --

3       A.   The last part, last week of September.

4       Q.   Okay. And then at what point -- so you started  
5                           as just a consultant?

6       A.   Correct.

7       Q.   And did you have a consulting contract?

8       A.   I had a personal service contract with the City.

9       Q.   Personal service contract. So that's what a PSC  
10                          is?

11      A.   That's correct.

12      Q.   You just helped me out with something there. And  
13                          then at what point did it transition to we like  
14                          this gentleman, I think we'd like him to stick  
15                          around on a more full-time basis?

16      A.   In November I became the director of labor  
17                          relations for the City.

18      Q.   Okay. And what did you do between the time you  
19                          started in September and November?

20      A.   I was working over with the police department and  
21                          the fire department.

22      Q.   And what were you doing, what were your job  
23                          duties?

24      A.   In labor relations.

25      Q.   Tell me a little bit more specifically in terms

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MICHAEL HALL

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of what you were doing on a day-to-day basis?

3

A. Basically working with the leadership advising them on -- working with them along with the Jones Day team on the labor agreements that we were trying to negotiate.

7

Q. I'm sorry, on the labor?

8

A. Labor agreements we were trying to negotiate.

9

Q. And were there negotiations ongoing at that time?

10

A. Yes.

11

Q. And so was your principal job to advise the City and specifically the police and fire departments on those negotiations?

14

A. Well, I was basically working with the commissioner of the fire department, figuring out okay, what are your real needs that you need and making sure that we were really conveying those on and getting those tied into the labor agreements.

19

And the same thing when I went over to the fire, you know, working with the police -- excuse me, with the police making sure that we are putting into the labor agreements what was going to make the police and fire departments more efficient going forward.

25

Q. And are we primarily talking about here work rule

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MICHAEL HALL

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agreements and you were also overseeing health  
care for active and retired employees?

4

A. That's correct.

5

Q. Any other principal job functions?

6

A. That's it.

7

Q. I take it, you were also, when you say you were  
responsible for the administration of collective  
bargaining agreements, does that also include  
negotiating new collective bargaining agreements?

10

A. That's correct.

11

Q. Is it true when you joined the City -- when you  
became the director of labor relations for the  
City, and did you say that was in November of  
2013?

12

A. That's correct.

13

Q. When you became the director of labor relations  
in November of 2013, is it true that the City's  
collective bargaining agreements had all expired?

14

A. To the best of my knowledge.

15

Q. And is it also true that the City's union  
employees were working under what are called the  
CETs or City employment terms?

16

A. That's correct.

17

Q. Okay. So was one of your principal focuses upon

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1 MICHAEL HALL

2 Q. I'm sorry, who was it when you were -- when you  
3 started there, I should say?

4 A. Valerie Colbert.

5 Q. Valerie Colbert, and who was the manager, did you  
6 say of benefits?

7 A. Yeah, Wendy Brown was manager of benefits at the  
8 time.

9 Q. Now, it looks to me like today you have a  
10 different title from director of labor relations;  
11 is that correct?

12 A. I am also the interim director of human resources.

13 Q. Okay. So at some point did Mr. Tyler leave?

14 A. Mr. Tyler -- when the new mayor was elected, he  
15 came in in January the 1st and mid January,  
16 Mr. Tyler left and the mayor asked me to assume  
17 the role of interim director of human resource as  
18 well as the labor relations director's job.

19 Q. So you had two jobs instead of one?

20 A. That's correct.

21 Q. And have you been doing Mr. Tyler's job ever  
22 since?

23 A. Yes.

24 Q. Did you get a raise?

25 A. No.

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1                           MICHAEL HALL

2                           Mr. Tyler was doing so I know what you took over  
3                           for him. So you talked about earlier about the  
4                           fact that he was -- he had general HR  
5                           responsibility for nonunion employees and then  
6                           some union related obligations; do you remember  
7                           that testimony?

8                           A. Yes.

9                           Q. Okay. So what -- what were his job functions  
10                          with respect to nonunion employees?

11                          A. Well, responsible for all the hiring.

12                          Q. Okay.

13                          A. All the transfers, promotions, you know, staffing  
14                          for the City, for all the employees.

15                          Q. I take it that, so it must be quite a different  
16                          animal when you have nonunion employees when it  
17                          comes to setting wages and work rules and so on  
18                          and so forth; is that true?

19                          A. Pretty much so.

20                          Q. And how do you do it? Does the City just impose,  
21                          you know, whatever salary it wants to for a  
22                          position rather than having to bargain like it  
23                          would in the labor context?

24                          A. Well, they have established salary ranges that are  
25                          evaluated on a regular basis.

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1 MICHAEL HALL

2 A. I'm not sure.

3 Q. Okay. And who reports to you on the interim HR  
4 side of the house?

5 A. I have a deputy that reports to me.

6 Q. And who is that?

7           A.     She just retired last week.

8 Q. Oh, man. What was her name?

9 A. Kathy Haves.

10 Q. Okay. So --

11 A. So I should put all three hats on up here now?

12 Q. So she is the only one?

13 A. Yes.

14 Q. So is the HR department currently just you --  
15 well, I asked you about your direct reports, how  
16 big is the HR department including HR and labor  
17 relations?

18 A. HR, labor, benefits total, I think, 93 people.

19 Q. Oh, 93 people, okay. So two of whom report  
20 directly to you?

21 A. Correct.

22 Q. And everybody else reports directly or indirectly  
23 up into them?

24 A That's correct.

25 O. Or Ms. Hayes until she left?

1 MICHAEL HALL

2 A. Until Ms. Haves, Valerie, and then the benefits  
3 section, so I also had the benefits section  
4 reporting directly to me.

5 Q. Okay. So how do -- how, if at all, do pensions  
6 factor into the HR department?

7 A. They don't.

8 Q. Okay. So that's a separate --

9           A.     Totally separate.

10 Q. -- function?

## 11 A. Function.

12 Q. And who handles pensions within the city?

13 MS. KOVSKY-APAP: Objection, form.

14 BY MR. HACKNEY:

15 Q. I mean like administration, negotiation, et  
16 cetera?

17 A. They have their own team.

18 Q. Okay. Whoever it is, it's not you?

19 A. I don't have any part of it.

20 Q. Okay. Is it fair to say that part of your job as  
21 interim HR director and director of labor  
22 relations is to keep your finger on the pulse of  
23 the City's workforce?

24 MS. KOVSKY-APAP: Objection, form.

25 A. I have to have a good feel of what's going on.

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1 MICHAEL HALL

2 BY MR. HACKNEY:

3 Q. Do you agree with my statement, that that's part  
4 of your job?

5 A. Yes.

6 Q. And is it fair to say that part of your job is to  
7 be on top of issues that are affecting the City's  
8 ability to retain employees?

9 MS. KOVSKY-APAP: Objection to form.

10 A. Repeat that, please?

11 BY MR. HACKNEY:

12 Q. You bet. Is it fair to say that part of your job  
13 is to be on top of issues that are affecting the  
14 City's ability to retain employees?

15 A. Correct.

16 Q. And is it fair to say that part of your job is to  
17 be on top of issues that are affecting the City's  
18 ability to hire new employees?

19 A. Correct.

20 MS. KOVSKY-APAP: Objection to form.

21 BY MR. HACKNEY:

22 Q. Is it fair to say that part of your job is to be  
23 on top of issues that are affecting employee  
24 morale of City employees?

25 MS. KOVSKY-APAP: Objection, form.

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1 MICHAEL HALL

2 A. Yes.

3 BY MR. HACKNEY:

4 Q. Fair to say that part of your job is to be on top  
5 of issues that are affecting the effectiveness of  
6 City employees?

7 MS. KOVSKY-APAP: Objection, form.

8 A. Yes.

9 BY MR. HACKNEY:

10 Q. Those are important parts of your job, right?

11 A. All parts are important.

12 Q. Yeah. And those would be also included in that,  
13 correct, as important?

14 A. Yes.

15 Q. When you joined the City, whether you consider it  
16 in your role as a consultant or director of labor  
17 relations, did you take steps to familiarize  
18 yourself with the state of the City's workforce  
19 upon -- upon joining the City?

20 A. Would you repeat that?

21 Q. Sure. So you come to a new job with the City of  
22 Detroit, did you take steps to familiarize  
23 yourself with the state of the workforce?

24 A. Yes.

25 Q. How many City employees were there when you

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1                           MICHAEL HALL

2                           costed, you know. You know.

3                           BY MR. HACKNEY:

4                           Q. You remember that you talked about when you were  
5                           in the consultant phase of your time with the  
6                           City how you were consulting on negotiations with  
7                           the police and fire labor unions?

8                           A. Correct.

9                           Q. Since you became director of labor relations,  
10                          have you also been involved in the negotiations  
11                          with all of the City's unions?

12                          A. Yes.

13                          Q. What has your role been in those negotiations,  
14                          meaning where do you fit, are you the lead  
15                          negotiator for the City?

16                          A. Lead negotiator for the City, yes. Lead  
17                          negotiator for the negotiations, our negotiations  
18                          are really being headed up by the Jones Day team.

19                          Q. Okay. So you're the -- you're the City contact  
20                          with respect to collective bargaining agreement  
21                          negotiations, correct?

22                          A. That's correct.

23                          Q. Are you saying a lot of the negotiating is  
24                          happening between the lawyers for the union and  
25                          for the City?

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1 MICHAEL HALL

2 A. That's correct.

3 Q. Okay. So your role is principally consulting  
4 with the Jones Day lawyers about how the  
5 negotiations are going?

6 A. And sometimes directly at the table.

7 Q. And at some times you're directly there?

8 A. Right.

9 Q. Okay. So it's either you're talking to them  
10 about what they're talking about with the union's  
11 lawyers or you're in a meeting as a principal  
12 with the union's principal and counsel?

13 A. Correct.

14 Q. The City -- just so you know, this is my  
15 knowledge about where you're at on collective  
16 bargaining agreements. There's been an  
17 announcement of how would you put it, to have an  
18 agreement in principal, however you want, there's  
19 been an announcement that some level of agreement  
20 has been struck with some number of unions, but  
21 not all of them?

22 A. That's correct.

23 Q. And do you know whether those agreements have  
24 been reduced to collective bargaining agreements  
25 yet, formally executed documents?

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1                           MICHAEL HALL

2                           questions.

3                           MR. MARRIOTT: Actually I don't think I  
4                           will. I think I'm good.

5                           MR. HACKNEY: Lucky day, my friend.

6                           MS. KOVSKY-APAP: Actually just give us  
7                           about five minutes, if you don't mind.

8                           MR. HACKNEY: Oh, sure. There may be  
9                           some redirect.

10                          VIDEO TECHNICIAN: You want to go off?

11                          MS. KOVSKY-APAP: Yes.

12                          VIDEO TECHNICIAN: The time is 1:22  
13                          p.m., we are off the record.

14                          (Recess taken at 1:22 p.m.)

15                          (Back on the record at 1:28 p.m.)

16                          VIDEO TECHNICIAN: The time is 1:28  
17                          p.m., we are now on the record.

18                          MS. KOVSKY-APAP: I have no redirect,  
19                          Mr. Hall. Thank you very much for your time.

20                          THE WITNESS: Thank you.

21                          VIDEO TECHNICIAN: This concludes the  
22                          video deposition of Michael Hall. The time is  
23                          1:29 p.m., we are now off the record.

24                          (The deposition was concluded at 1:29 p.m.  
25                          Signature of the witness was not requested by

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